

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

JANE DOEs 1-9,

Plaintiff,

v.

COLLINS MURPHY, SHARON
HAMMONDS, BRENDA F. WATKINS,
LIMESTONE UNIVERSITY, MG
FREESITES, LTD., d/b/a PORNHUB.COM,
MG FREESITES II LTD., MINDGEEK
S.A.R.L., MINDGEEK USA, INC., MG
BILLING LTD., and HAMMY MEDIA LTD.
d/b/a XHAMSTER.COM, TRAFFICSTARS
LTD., WISEBITS LTD, XHAMSTER IP
HOLDINGS LTD, WISEBITS IP LTD,

Defendants.

CASE NO. 7:20--CV-00947-DCC

**DEFENDANT MINDGEEK S.A.R.L.'S
CONSENT MOTION FOR EXTENSION
OF TIME TO RESPOND TO FIFTH
AMENDED COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b), Defendant Mindgeek S.A.R.L. files this Consent Motion for Extension of Time to Respond to Plaintiffs' Fifth Amended Complaint (Dkt. No. 193), and in support thereof states as follows:

1. On June 6, 2022, Plaintiffs filed the Fifth Complaint in this action (Dkt. No. 193).
2. On November 14, 2022, Mindgeek S.A.R.L. filed a timely Motion to Dismiss the Fifth Amended Complaint in this action (Dkt. No. 233).
3. On August 15, 2023, the Court held a hearing and orally denied Mindgeek S.A.R.L.'s Motion to Dismiss.
4. On August 16, 2023, the Court entered a Minute Entry (Dkt. No. 305) denying Mindgeek S.A.R.L.'s Motion to Dismiss.

5. Pursuant to Rule 12(a)(4), FRCP, Mindgeek S.A.R.L. has fourteen (14) days after the Court's denial of its Motion to Dismiss to file its responsive pleading. Therefore, Mindgeek S.A.R.L.'s responsive pleading was to be due on or before August 30, 2023.

6. Counsel for Mindgeek S.A.R.L. is working on its responsive pleading, but due to conflicting schedules with counsel and the client, counsel is unable to finalize the responsive pleading by the deadline.

7. Federal Rule of Civil Procedure 6(b) allows this Court discretion to enlarge periods of time for good cause where, as here, the requested extension is made before the deadline. Defendant Mindgeek S.A.R.L. respectfully request an additional 14 days for it to file its responsive pleading. Therefore, with the extension, Mindgeek S.A.R.L.'s responsive pleading to Plaintiff's Fifth Amended Complaint would be due on or before September 14, 2023.

8. The requested extension is not sought for dilatory reasons or for any other improper purpose, will not affect any other deadlines, will not prejudice any party or the Court, and no prior extension has been requested from the Court by Defendant Mindgeek S.A.R.L.

9. Plaintiffs consent to Defendant Mindgeek S.A.R.L.'s request.

WHEREFORE, Defendant Mindgeek S.A.R.L. respectfully requests this Court enter an order enlarging the time within which to respond to the Fifth Amended Complaint an additional fourteen (14) days which makes Mindgeek S.A.R.L.'s response due on or before September 14, 2023.

SIGNATURE PAGE TO FOLLOW

Respectfully submitted,

DATED August 29, 2023

Columbia, South Carolina

TURNER, PADGET, GRAHAM AND LANEY,
P.A.

By: /s/ Mark Goddard

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